

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DONNA WOOD, et al., individually and on behalf of  
all others similarly situated,

Plaintiffs,

v.

MIKE BLOOMBERG 2020, INC.,

Defendant.

20 Civ. 2489 (KMW)(GWG)

**RESPONSE TO PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY**

Defendant Mike Bloomberg 2020, Inc. (the "Campaign") hereby submits this response to Plaintiffs' "Notice of Supplemental Authority." *See* Dkt. No. 147. Plaintiffs submit various identical three-sentence orders issued by Judge Mark Pittman of the U.S. District Court for the Northern District of Texas denying motions to dismiss in cases filed by former employees of the Campaign in that court (the "Orders"). Plaintiffs claim that the Orders support Plaintiffs' opposition to the Campaign's pending motion to dismiss in this case. *Id.* Contrary to Plaintiffs' contention, the Orders have no bearing on the Campaign's motion pending before this Court. *See* Dkt. Nos. 110-113, 133, 142. Unlike this case, which must be decided under New York law, the Orders involve the application of Texas law. Moreover, the Orders provide no reasoning whatsoever for why the motions in the Texas court were denied and therefore offer no guidance to this Court on any of the issues addressed in the Campaign's pending motion.

Dated: September 4, 2020  
New York, New York

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